
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY


UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. : Hon. Michael A. Hammer
ANDREW CHU : Mag. No. 24-10096

I, Jill C. Lasseter, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A


I further state that I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations and that this complaint is based on the following facts:

SEE ATTACHMENT B



Jill C. Lasseter Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Special Agent Jill C. Lasseter attested to this Complaint by telephone pursuant to Fed. R. Crim. Pro. 4.1(b)(2)(A) on April 17, 2024 in the District of New Jersey.



Honorable Michael A. Hammer
United States Magistrate Judge

ATTACHMENT A

COUNT ONE
(Possession of Child Pornography)

From on or about May 1, 2023 through on or about November 7, 2023, in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

ANDREW CHU,

knowingly did possess and access with intent to view material that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped, and transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

ATTACHMENT B

I, Jill C. Lasseter, am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) my review of publicly available information; and (b) my review of evidence, including documents and other materials. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about April 6, 2021, defendant ANDREW CHU ("CHU") was convicted in the United States District Court for the District of New Jersey of one count of Possession of Child Pornography, in violation of Title 18, United States Code, Section 2252A(a)(5). On or about March 22, 2022, CHU was sentenced to eight months' imprisonment and five years of supervised release. On or about December 23, 2022, CHU was released from Bureau of Prisons custody and began his supervision by the U.S. Probation Office ("Probation"). As part of his supervised release, CHU was ordered to comply with multiple conditions, including not committing any crimes, computer monitoring and restricted contact with minors. CHU was subjected to examinations of his computer, cellular telephones, or any electronic media device by Probation and the installation of a computer monitoring program (the "Monitoring Program"), which Probation could monitor. At all times relevant to this complaint, CHU resided in Edison, New Jersey.

2. In or around November 2023, Probation was notified by the Edison, New Jersey Police Department that CHU was seeking to purchase young children's shoes through Facebook Marketplace. Probation subsequently conducted a remote review of CHU's laptop computer via the Monitoring Program, pursuant to the special condition of computer monitoring.

3. On or about November 7, 2023, at the request of Probation, CHU met with his assigned Probation officer and brought to Probation his laptop computer and his cell phone.

4. Probation shared with law enforcement screen captures recorded from CHU's laptop by the Monitoring Program and observed approximately 100 images depicting child pornography that were viewed on the Internet using CHU's laptop. For example, a screen capture from on or about October 20, 2023, recorded one file from an internet web browser ("Application-1"), which depicts three pictures of the same nude pre-pubescent minor female ("Minor Victim-1").

Two of the images depict Minor Victim-1's vaginal area and one of the images depicts Minor Victim-1's exposed buttocks with her finger touching her buttocks. A second Application-1 file depicts multiple nude images of Minor Victim-1 in various poses. Minor Victim-1 is depicted on her knees with her buttocks visible and her finger(s) inside her buttocks. The image depicts Minor Victim-1's vagina and her fingers touching her vagina.

5. Law enforcement also observed multiple screen captures that depict CHU live video chatting with strangers and masturbating utilizing a free, web-based online chat service ("Application-2"). CHU's face is not visible, but the male in the screen has the same body type as CHU and he is wearing a distinctive gold necklace that Probation recovered from CHU on or about November 7, 2023. CHU is engaging in video chats with what appears to be nude minor females on the other screen.

6. On or about August 5, 2023, screen captures from a video chat using Application-2 between CHU and a purportedly minor female depict CHU masturbating even after the female tells CHU she is a minor. The chat participants are listed as "You" and "Stranger," which indicates that since the images were captured from CHU's laptop, he is participant "You" and the minor female is "Stranger." The screen captures depict the following chat:

You: girl?
Stranger: f
You: can I kum for u?
You: help me ot
You: out
Stranger: nooooooooo im 11
You: shoe me more
Stranger: im 11
You: tongue out
Stranger: im a minor
You: open ur mouth

7. On or about November 4, 2023, Application-2 screen captures depict another video chat between CHU and a nude pubescent minor female ("Minor Vicim-2"). The video chat depicts Minor Victim-2's face, her vagina, and her finger(s) touching her vagina. The screen captures also show a brush handle touching her vagina. Simultaneously on the screen displaying CHU, CHU is seen masturbating as the following chat conversation is occurring:

You: Hi
Stranger: Hi
You: lets play
You: bring the camera down

Stranger: I'm so wet
You: make daddy kum
You: good girl
You: are you in high school baby?
Stranger: Yes
You: beautiful girl
You: touch yourself for daddy
Stranger: Yes

8. A forensic examination by law enforcement of CHU's laptop computer revealed that it was used to access Application-2 and CHU's Facebook account.